

Submitted Via FAX to 410.358.1236



March 31, 2009

Pamela W. Barclay
Director, Center for Hospital Services
Maryland Health Care Commission
4160 Patterson Avenue
Baltimore, Maryland 21215

**RE: Request for Informal Public Comment On Proposed Amendments to
State Health Plan for Facilities and Services:
Specialized Health Care Services – Cardiac Surgery and
Percutaneous Coronary Intervention Services
COMAR 10.24.07 Table A-1. Summary of Requirements for
Primary PCI Programs: Hospitals with and without On-Site Cardiac Surgery**

Dear Ms. Barclay:

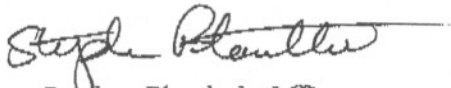
Thank you for the opportunity to continue our participation in the process to refine programmatic criteria for the primary angioplasty services for the citizens of Maryland. St. Agnes has reviewed the draft proposed amendments and offers the following comments:

1. Saint Agnes Hospital and its medical staff support the recommendation to reduce door-to-balloon time to 90 minutes for primary angioplasty services. This is the standard of care for patients with ST-elevation myocardial infarction and offers best potential for optimal patient outcome.
2. Saint Agnes strongly recommends that the MHCC establish equitable standards for monitoring and reporting of operational quality performance standards between the primary/non-primary PCI waiver sites and those hospitals with on-site cardiac surgery. Saint Agnes believes it is to the benefit of citizens of Maryland that there be greater transparency of angioplasty performance standards for all hospitals regardless of their regulatory status.
3. Achieving a 30 minute reduction in door-to-balloon times from 120 minutes to 90 minutes for primary angioplasty patients will require significant changes in clinical operational processes. Saint Agnes would encourage the Commission to consider a phase-in period achieving the revised standards. Saint Agnes would

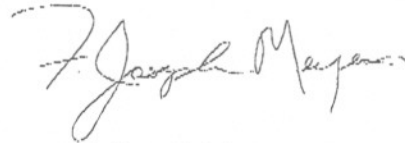
suggest a three quarter phase-in period for whereby in the first quarter of the new adopted of the proposed amendments that door-to-balloon would be 110 minutes. Subsequent quarters would include further 10 minute reduction until 90 minute threshold is achieved.

Saint Agnes appreciates the regulatory authority of the Maryland Health Care Commission to direct and monitor the performance of angioplasty services in Maryland. We value the opportunity to participate in the Commission's process to improve cardiac care for the citizens of Maryland. When the Commission adopts permanent amendments to the primary angioplasty program, Saint Agnes is committed to meeting all program standards.

Sincerely,



Stephen Plantholt, MD
Chief, Cardiology
St. Agnes Hospital



F. Joseph Meyers
Director, Strategic Planning
St. Agnes Hospital